

JAN 25 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

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**Attorneys for Plaintiff Lisa Black**

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN MARIANA ISLANDS**

<p><b>LISA BLACK,</b></p> <p style="text-align: center;"><b>Plaintiff,</b></p> <p style="text-align: center;"><b>vs.</b></p> <p><b>JIM BREWER, individually and in his          official capacity as Acting Principal for          Hopwood Junior High School,          COMMONWEALTH OF THE          NORTHERN MARIANA ISLANDS          PUBLIC SCHOOL SYSTEM,          and JOHN AND/OR JANE DOE,</b></p> <p style="text-align: center;"><b>Defendants.</b></p>	<p>) <b>CIVIL ACTION NO. 05-00378</b></p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>) <b>PLAINTIFF'S PRE-DISCOVERY          DISCLOSURE STATEMENT</b></p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>
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Plaintiff, by and through her attorneys, pursuant to L.R. 16.2(c)(J)(d) and Fed.R.Civ.Pro. Rule 26(a), submits the following disclosures:

**A. Persons With Potentially Discoverable Information**

1. The following individuals may be likely to have discoverable information that the Plaintiff may use to support her claims. The addresses and telephone numbers of this individuals are unknown to Plaintiff at this time, however many of them are current or former employees of Defendant Commonwealth of the Northern Mariana Islands Public School system, and it and the remainder of the Defendants are likely to already be in possession of this contact

**ORIGINAL**

1 information. In any event, Plaintiff will provide such contact information as soon as practicable  
2 upon discovery. These individuals are likely to have discoverable information regarding,  
3 generally, the events which lead to the facts alleged in Plaintiff's Complaint, and specifically,  
4 the actions of Defendant Jim Brewer and his interaction with Plaintiff.  
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6 Ada, Carmelita P.  
7 Aldan, Criselda C.  
8 Barja, Katherine Dolores A.  
9 Bayro, Leonila R.  
10 Brel, Felisa  
11 Buniag, Arlene CM.  
12 Cabrera, Emily D.  
13 Cannon, Eloisa A.  
14 Castro, Cynthia C.  
15 Davis, John H.  
16 Davis, Teodosia V.  
17 Dela Cruz, Francisco S.  
18 Douglas, John  
19 Escobar, Sancho E.  
20 Esteves, Devina L.  
21 Ferrari, Joseph L.  
22 Gabionza, Ronald SN.  
23 Gagaring, Aida M.  
24 Gagaring, Pastor B.  
25 Grayer, Menchu V.  
26 Halloran, Christine F.  
27 Hamman, Cassandra A.  
28 Harmsen, Steven  
Hofschneider-David, Wilma Liza R.  
Humilde, Roy  
Ito, Edgar S.  
Javier, Yeldez T.  
Joab, Clarissa M.  
Keller, Osaky M.  
Kohout-Chase, Anne E.  
Lamkin, Ronald P.  
Litulumar, Luna Zena  
Lizama, Elizabeth M.  
Manahane, Cecile I.  
Masaharu, Terry N.  
Masga, Christine T.  
Mendiola, Donald B.  
Mendoza, Marilyn O.  
Mobel, Vanessa C.  
Nepaial, Elizabeth S.

1 Nielson, Nancy Jane  
2 Ordonez, Jaycie R.  
3 Ornes, Maria  
4 Pedersen, Rosemarie DJ.  
5 Quinata, Angelina B.  
6 Rabauliman, Edmond K.  
7 Rechebong, Francisca S.  
8 Rhodes, Douglas W.  
9 Rozic, Mark A.  
10 Sikyang, Nariany  
11 Starkey, Rory M.  
12 Torres, Aniwenda V.  
13 Charly Kentey  
14 Karen Klaver  
15 Karen Borja  
16 Frances Ulloa  
17 Francine Hofschneider  
18 Sean Frink

12 2. As their investigation of potential witnesses is ongoing, Plaintiffs reserve the  
13 right to disclose any other persons with potentially discoverable information as soon as is  
14 practicable.

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17 B. Description of Relevant Document

18 1. Plaintiff has available for inspection and copying all documents, data  
19 compilations, and tangible things that are in its possession, custody and control as required by  
20 Rule 26(a) Fed.R.Civ.Pro. These documents are currently located in the offices of Plaintiff's  
21 counsel and will be produced or made available for inspection pursuant to appropriate discovery  
22 requests at a time and place convenient for all parties.

23 2. These documents consist of correspondence between the various parties prior to  
24 the filing of this suit, portions of Plaintiff's personnel file, copies of evaluations, recordings of  
25 conversations relevant to the subject matter of this case and other items which may contain  
26 information relevant to this matter. As these documents are voluminous in nature, Plaintiff is  
27 still attempting to inventory and organize these items and will disclose their nature and contents  
28

1 as soon as practicable in accordance with the rules of discovery.

2 3. As Plaintiffs investigation of this matter is ongoing, they reserve the right to  
3 supplement this disclosure with descriptions of other relevant documents as soon as is  
4 practicable.

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7 C. Computation of Damages

8 Plaintiff has suffered the loss of back wages amounting to the full amount that she was  
9 being paid as a schoolteacher for the period of time that she was unemployed following her  
10 termination by Defendants (back pay). Additionally, as her current salary is far below what she  
11 was making prior to her discharge, Plaintiff will seek compensation in an amount that will  
12 eliminate this disparity (front pay). Furthermore, Plaintiff is seeking damages in an amount to  
13 compensate her for the breach of her employment contract. Finally, Plaintiff will seek damages  
14 for emotional distress and injury to her professional and personal reputation in an amount to  
15 exceed \$100,000.00. As computation of these damages is ongoing and will likely involve the  
16 efforts of expert financial witnesses, Plaintiff is unable to determine an exact total for these  
17 damages, but will disclose such an amount as soon as is practicable.

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20 D. Insurance Agreement

21 Plaintiff is not aware of any particular insurance agreement that will have any bearing  
22 upon this matter.

23 Dated: January 25, 2006.

24  
25 O'CONNOR BERMAN DOTTS & BANES  
Attorney for Plaintiff Lisa Black

26  
27 By:   
28 GEORGE L. HASSELBACK